

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Joanne Warwick,  
Plaintiff

Case: 2:23-cv-11779  
Judge: Berg, Terrence G.  
MJ: Grand, David R.  
Filed: 07-25-2023  
Warwick vs City of Detroit, et al (DP)

V.

City of Detroit, Mike Duggan in his individual capacity, Mary Sheffield, Scott Benson, James Tate, Donald Rencher, Julie Schieder, Kevin Schronce, Antoine Bryant, Dan Rierdan, Fred Durhal, Coleman A. Young II, Katy Trudeau, [REDACTED] in their individual and official capacities, Mary Waters, Angela [REDACTED] Calloway, Latisha Johnson, Gabriela Santiago-Romero in their official capacities, and Darryl Carter, Ronald McDonald, Pamela Martin-Turner, Lisa Tucker, Everett Stone, Monica Edmonds, Leslie Graham-Andrews, Adam Hollier, Sonia Delley, George Eason, Etta Garth, Tarrence Wheeler, Edgar L. Vann II, [REDACTED] and Sheila Cockrell  
Defendants.

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Request for Temporary Restraining Order, Complaint Damages and Injunctive Relief and Declaratory Relief and Demand for Trial by Jury

**NOW COMES** Plaintiff Ms. Warwick in Pro per for her Request for Temporary Restraining Order and Complaint for damages and Declaratory and Injunctive Relief, and states as follows:

### **INTRODUCTION**

1. This case involves the secretive planning by Vanguard Community Development Corporation (Vanguard)—a non-profit City/Community partner started by Bishop Edgar Vann (who will not even speak with Ms. Warwick, even though she has never spoken with Bishop Vann in her entire life), Mr. Daryl Carter of Avanth Capitol Management, Mr. Ronald McDonald of RMC Developments of a big proposed 180-unit development proposal called “North End Landing” (NEL for short), a mostly expensive and mostly rental complex (only six units will be for purchase) to be put in an area that previously had mostly single family homes, duplexes, and townhomes, and most of which would be on the block on which Ms. Warwick lives.

1a. This project was planned with a selected, unelected group of all black and longer-term North End residents to the exclusion of white and newer residents to the area, and even longer-term black residents—all of whom live in the footprint area of the proposed NEL.

1b. On information and belief, these individuals not only signed Non-Disclosure Agreements with the developers, but with the City too, as Ms. Warwick has seen blank NDA forms in the office of the Planning Department of the City of Detroit, and given that Ms. Warwick frequently went to City Council meetings speaking at public comment and speaking with various City officials asking for the Planning Study to be done in her neighborhood.

1c. Given the silence she frequently faced in response to her requests for the Planning Study to happen, she believes that many of the City officials feigned ignorance to her regarding her requests to do truly inclusive and sensitive community engagement around development in her neighborhood, knowing that the NEL project was being planned in secret from her and other nearby residents and home owners..

1d. Ms. Warwick believes that these secretive efforts were done on purpose to exclude especially her, a vocal resident who regularly exercises her rights to free speech and to petition government for redress of grievances, and other residents who live in the impact area of the proposed project from full participation in a long-awaited Planning Study of the North End, thus depriving them of the opportunity to express their concerns and

desires about the immediate area in which they live in the Planning Study process.

1e. The vast majority of the would-be-most impacted residents, including Ms. Warwick, do not want this development of such high density which would dramatically change the historic character of their neighborhood, essentially turn the immediate area into mostly rental units instead of building single family homes, duplexes and/or townhomes for people to buy, would likely cause great traffic congestion, especially given that the development is in the area of Delores Bennett Park/Playground, which already draws lots of traffic to the park, and this NEL project would cause them to suffer through the extended construction process—dust, noise, rodent migration and very possibly trespassing on their land by construction workers, unlike the majority of the selected, unelected Vanguard “internal community cabinet” members who helped plan this, most of whom live blocks away.

1f. Time is of the essence in this matter because the Detroit City Council is set to vote on tax incentives and related tax benefits for the project on July 25, 2023, which as Ms. Warwick understands would seal the deal, and thus deprive her and local residents of the opportunity to fully participate and

give their input in the long-awaited Planning Study in the North End, which Ms. Warwick has been waiting for since early 2015, when Mr. Dan Rierdan of the City Planning Department told her that the City was planning on issuing a RFP that spring or early summer to do a planning study in her neighborhood—thus squashing Ms. Warwick's free speech rights and right to petition government for redress of grievances and to express what she and her nearby neighbors would like to see happen in the immediate area in which they live, rather than have it controlled by others who live further away.

1g. This is not equal treatment of residents in the lower North End, when only a selected few got to sit down apparently for years and plan the impact residents' area of the North End, without including the impact residents in the visioning and planning of this area and proposed project, without doing the Planning Study first in the North End.

1h. Ms. Warwick believes this was done on purpose to not include us, and not hear our voices in the long-awaited Planning Study of the North End.

1i. While the government may have a legitimate interest in rebuilding the North End, much of which it appears was destroyed on purpose, to proceed in this way is not rationally related to this government interest, given that

the North End is already considered “hot” as many of us receive offers constantly to buy our properties, and developers from in state, out-of-state and even out-of-the-country have come here to invest in the North End. And it is irrational to create so much community tension and resident division, grief and anxiety in the would-be-most impacted residents who feel so purposely excluded and as if they don’t matter to their elected officials.

1j. After Ms. WARwick asked about community engagement in the neighborhood around the planning study back in 2015, City officials kept coming up with excuses for their change of plans to proceed with the Planning Study back in 2015, saying things like, “We’re not getting to the North End yet”, and “We can’t do Planning Studies all over the City at once” and “Wait for the new Planning Director to come” (Mr. Maurice Cox who has already come and gone).

1k.. Then in March of 2021, Mr. Daryl Carter finally came to the Lower North End Block club to present the NEL plan they had been working on with Vanguard CDC, and now Ms. Warwick knows, in collaboration with City officials, namely Mr. Donald Rencher, who was at the time the head of HRD—the Housing and Revitalization Department, and on information and

belief Mayor Mike Duggan and others in the Real Estate Committee, in secret from almost all of the would-be-most-impacted residents-except for one person, Mr. Quincy Jones, who is one of the Vanguard CDC selected, unelected "Internal Community Cabinet" members, again who are all black and longer-term residents than Ms. Warwick, and some of whom have exhibited hostility toward Ms. Warwick and/or told untruths about the opponents of NEL in efforts to get it passed, knowing that the vast majority of people who live in the footprint area do not want this development, were not included in the visioning and planning of the project as was done with Vanguard's selected, unelected "internal community cabinet" members (most of whom live blocks away and would not suffer the prolonged construction of the project on a daily basis, nor the added density and parking congestion in the area of their homes that this project would likely bring to an area that already gets great traffic to the nearby Delores Bennett Playground/Park.)

11. Vanguard Executive Director Pamela Marin-Turner, on information and belief, at the suggestion of City officials selected, the unelected small group of North End residents, which Vanguard CDC calls its "Internal Community

Cabinet”, who were/are again all black, and longer term residents of the North End.

2. This situation has caused Ms. Warwick great mental anguish, anxiety, worsened PTSD, worsened depression, agoraphobia, **severe** sleep disturbances with early morning wake-ups with severe anxiety, loss of sleep focus on other matters in her life, and, including a diagnosis for the first time in her life of having high blood pressure, a diagnosis of bipolar disorder, and creating a great loss of faith in local government.

3. In this ugly matter, the race card and newby v. older resident cards have been played against her, and she had experienced first amendment violations and attempts to silence her in the full participation of the planning of the immediate area in which she lives, by the City approving a public-land sale for a massive mostly expensive to the average Detroit rental complex before first doing a truly inclusive and sensitive planning study in her neighborhood first.

3a. After having a meeting with City Council members Mary Waters—Member-at-Large, and Member Latisha Johson, of the City Council’s “Equitable Development Task Force”, this past Thursday evening, it has become abundantly apparent to Ms. Warwick that this deal is set to



pass the Council in violation of the Detroit City Charter and in violation of equal protection under the US and Michigan Constitutions, and in violation of her free speech rights, and other laws.

3b. Plus, Ms. Warwick heard from a neighbor that on Monday, July 25, 2023, that staff from her District 5 City Council person was calling some of her neighbors who have signed the NEL opposition petition to try and persuade them to support the NEL project which indicates to ms. Warwick, on information and strong belief, that Member Mary Sheffield plans to vote yes on the final votes on NEL. Wow!!! But they didn't try calling Ms. Warwick to persuade her to support NEL.

3c. One day recently, Ms. Paris Blessman of District 5 Councilmember Sheffield's staff said to Ms. Warwick, "You are so intelligent, you just listen to what people say so that you can dig into it." To which Ms. Warwick replied, "You mean I listen to what I hear and I respond?" So, this is evidence that some do not want me to speak or fully participate in the Planning Study, and why Ms. Warwick was most likely purposefully excluded from so many of the NEL "community engagement" meetings held after the roll-out of NEL.

3d. Thus, Plaintiff Warwick seeks declaratory relief and immediate and permanent injunctive relief prohibiting Defendants from continuing their patterns and/or practices of perpetrating illegal and unconstitutional violations of Ms. Warwick's First and 14th Amendments under the US Constitution, and free speech and equal protection rights, and Bill of Rights #3 –no exclusive privileges– under the Michigan Constitution and laws of the State of Michigan, in addition to other state law claims.

#### **JURISDICTION and VENUE**

4. This Court has subject matter jurisdiction over Plaintiff Warwick's claims pursuant to 28 U.S.C. § 1331 (federal question) and 28. U.S.C. § 1343 (civil rights jurisdiction).

5. This Court has jurisdiction to issue injunctive and declaratory relief pursuant to 28 U.S.C. § 2201 and 2202 and Fed. R. Civ. P 57 and 65.

6.. This Court has supplemental jurisdiction over Plaintiff Warwick's state law claims pursuant to 28 U.S.C. § 1367.

7. This Court has jurisdiction over Plaintiff Warwick's claims against Mr. Daryl Carter and Mr. Ronald McDonald pursuant to 28 U.S.C. § 1332.

8. Venue is proper in the Eastern State of Michigan pursuant to 28 U.S.C. § 1391, as most or all of the events giving rise to the claims herein occurred in the Eastern District of Michigan.

### **PARTIES**

9. Plaintiff Joanne Warwick is an individual and Detroit resident who lives on the block of Smith upon which the bulk of NEL is proposed to be built.

10. Defendant City of Detroit is a municipal corporation, which does Planning Studies in some neighborhoods, and seems to have no plans to do them in others, and whose employees often plan developments and then rolls them out on residents. Thus, it regularly treats residents in a disparate fashion, allowing for Planning Studies with residents in some neighborhoods and not in others.

11. Defendant Mike Duggan is the Mayor of Detroit, and at all relevant times has been an official policy-maker of the City and is, on information and belief, almost always involved in Planning the City of Detroit, given statements he has made about speaking with developers who are looking for good deals in Detroit.

12. Defendant Mary Sheffield is the District 5 City Council member and is currently the President of the /Detroit City Council, and thus on information

and belief, has power to set agendas of the City Council and had the power to demand a Planning Study happen first in the North End which is in District 5.

13. Defendant Scott Benson is a Detroit City Councilmember who sits on the Planning Committee of the Detroit City Council and has already voted in favor for everything NEL, and who Plaintiff does not recall having voted down any development projects thus far.

14. Defendant James Tate is the Chair of the Council Planning Committee and has also voted in favor of everything NEL.

15. Defendant Fred Durhal is a Detroit City Councilmember who also sits on the Planning Committee since the beginning of 2022, and has thus far voted in favor of all matters NEL that have come before him..

16. Defendant Coleman A. Young II is a Detroit City Councilmember-at-Large who has been a Councilmember since the beginning of 2022, and thus far has voted in favor for all matters NEL that have come before him.

17. Defendant Donald Rencher is an employee of the City of Detroit who was the head of the Housing and Revitalization Department, who came on

a DLBA zoom call and pushed NEL in spring of 2021, thus letting Ms.

Warwick know that he was in on the planning of NEL.

18. Defendant Kevin Shronce is an employee of the City of Detroit who works for the Planning Department of the City and works on matters in the Central region of which the North End is a part.

19. Defendant Antoine Bryant is the current Director of the City of Detroit's Planning Department and on information and belief, must sign all development proposals which go before the City Council for a vote, and oversees other planning employees for the City.

20. Defendant Dan Rierdan is an employee of the City of Detroit in the Planning Department and on information and belief, works in the Central region of which the North End is a part.

21. Defendant Katy Trudeau is an employee of the City of Detroit who was the Interim Planning Director before Mr. Antoine Bryant took that position, and thus must have signed the document about the public land sale for NEL.

22. Defendant Mary Waters is a Detroit /city Council Member-at-Large since the beginning of 2022, and on information and belief has thus far voted for all things NEL since she has been on the Council.

23. Defendant Angela Calloway is a Detroit City Councilmember, and on information and belief has thus far voted for all things NEL since she has been on the Council starting in 2022.]

24. Defendant Latisha Johnson is a Detroit City Councilmember since the beginning of 2022, sits on the Planning Committee and upon information and belief has thus far voted for all things NEL that have come before her.

25. Defendant Gabriela Santiago Romero is a Detroit City Councilmember since the beginning of 2022, and on information and belief, has thus far voted in favor of all things NEL that have come before her.

26. Defendant Darryl Carter is the Chairman and CEO of Avanath Capital Management, LLC and is a resident of the State of California, and is one of the developers of NEL.

27. Defendant Ronald McDonald is the Managing Principle of RMC, Developments, LLC with an office in Columbia, MD, and on information and belief is a resident to the State of Maryland, and is one of the developers of NEL.

28. Defendant Pamela Martin-Turner is the Executive Director of Vanguard CDC based in Detroit, MI, which is one of the developers of NEL.

29. Defendant Everett Stone is an employee of Vanguard CDC.

30. Defendant Lisa Turner is an employee of Vanguard CDC.

31. Defendant Monica Edmonds is an employee of Vanguard CDC.

32. Defendant Leslie Graham-Andrews is the Chair of the Board of Vanguard CDC.

33. Defendant Adam Hollier is on the Board of Vanguard CDC.

34. Defendant George Eason is on the Board of Vanguard CDC.

35. Defendant Terrance Wheeler is on the Board of Vanguard CDC.

36. Defendant EttaGarth is on the Board of Vanguard CDC.

37. Defendant Edgar L. Vann is the founder of Vanguard CDC and is on its Board.

38. Defendant Sheila Cockrell works for Crossroads Consulting and was hired as as, on information and belief, as a consultant by the NEL Developers.

### **Background of the Case**

39. Ms. Warwick was verbally and racially assaulted in a corner store by a black man wearing a "North End Veteran" T-shirt, who overheard her on her cell phone telling a neighbor—who happens to be black— that Ms. Warwick was told by a (black) resident of her neighborhood that people were passing around the narrative that "White people were trying to stop a black

developer” , which she found insulting given that her opposition has nothing to do with the color of the developers’ skin and everything to do with the non-inclusive planning process used to come up with the project.

40. The man wearing the “North End Veteran” T-shirt told her to “Go back to Royal Oak” and said other racially charged things, and then as he exited the store, he stopped and screamed at the top of his lungs, “WHITE B-I-T-C-H LEAVE!!!!”

41. Ms. Warwick was so startled by this ugly occurrence that she contacted a friend of hers who has lived in the North End for over 30 years. She described the man and what he was wearing to her friend, who then found the man and told him to keep his hands off her, and told him that he did not understand what Ms. Warwick was about.

42. Ms. Warwick previously worked for the late Congressman John Conyers, Jr. starting back in the mid 90s. After doing a summer internship in his office, Mr. Conyers said to her, “Warwick, leave your waitressing job and come work for me.” She accepted the offer and worked on and off for Mr. Conyers, including in his Detroit and Washington, DC offices.

43. Also, in the mid 90s, Ms. Warwick worked at the Foreign Language Immersion and Cultural Studies School aka FLICS, when it was located in



the North End neighborhood of Detroit on Cameron near I-75 in the old Breitmeyer School and also for a short period in the adjacent school named Sherrard with FLICS students and students of Sherrard. Ms. Warwick speaks French, Spanish and as she jokes, "sometimes English" and was employed as the Building Substitute Teacher at the FLICS school.

44. Ms. Warwick worked at the FLICS school for a year and for Mr. Conyers. Then she went to Wayne State Law School and worked again for Mr. Conyers in his Detroit office. Then he eventually transferred her to his Washington,DC office. And thus she moved out of Detroit in approximately 1999 to work in DC.

45. After living and working in DC on Capitol Hill,she eventually left and moved to California where her paternal grandmother was born.

46. After having been through some traumatic experiences in California, including having been falsely arrested in an Occupy Protest march, and more unpleasantries, Ms. Warwick returned to her native state of Michigan in 2013, and she moved back to Detroit in 2014 and acquired her house on Smith Street in the North End that same year. She picked the North End because that was a neighborhood she had worked in and she wanted to be close to Wayne State University.

47. Ms. Warwick was horrified upon her return to Detroit to see much of Detroit had been destroyed, including so many historic homes in Brush Park, both of the schools in the North End where she had worked at, and so had many houses and structures of the North End.

48. Her plan was to return to Detroit and spend the rest of her life here.

49. There were many vacant homes in the area, including on her street. Her house had been broken into on more than one occasion, and things of hers stolen.

50. Also, upon her return to Detroit, Ms. Warwick helped a former Conyer's fellow employee save his elderly father's home from foreclosure by putting down some of her settlement money she received from the City of Oakland, CA for having been falsely arrested and incarcerated to get her friend's father into a payment plan, when she found out later that he should have been exempt due to his limited income. She petitioned the California court for a Declaration of Factual Innocence which was granted by the Court.

51. Thus, in helping her friend's father, she learned about the Hardest Hit Funds which were appropriated by the US Congress to help people in underwater mortgages and people facing tax foreclosure. Yet, her friend's father was being denied Hardest Hit Fund (HHF) Assistance.

52. She learned that the millions in HHF funds were diverted to bulldozing houses, and witnessed houses disappearing in her neighborhood without notice to residents. Ms. Warwick thought that many of these homes could have been saved, and remembered Mayor Duggan telling people at Little Rock Baptist Church in 2015 that "We're not bulldozing houses that can be saved" She thus became a critic of the Detroit Land Bank Authority (DLBA) and the Duggan Administration as she disagreed with many of their actions.

53. Ms. Warwick did some research and found an article by Stanford-trained attorney Professor Yxta Maya Murray who wrote a law review about the blight takings in Detroit by Mike Duggan and the DLBA, which Professor Murray thought were unconstitutional uses of eminent domain in Michigan. Ms. Warwick agrees with Ms. Murray on this topic, given that voters in Michigan passed a constitutional amendment limiting the use of eminent domain after the 2005, United States Supreme Court decision in *Kelo v. City of New London*, 545 US 469, ruled that a city could take the private property for private commercial development where the economic redevelopment would benefit a sufficiently economically distressed area. See article X, section 2 of the Michigan

Constitution—eminent domain; compensation, which disallows the use of eminent domain to take “private property for transfer to a private entity for the purpose of economic development or enhancement of tax revenues.”

54. Ms. Warwick has helped neighbors fend off the DLBA from taking their houses through the “Nuisance Abatement Program” being used by the DLBA and Mayor Mike Duggan.

55. Ms. Warwick has helped other Detroiters fend off the City from either taking their homes or trying to demolish their homes.

56. In addition, Ms. Warwick was pleasantly surprised to find an urban farm close to her house in the North End. When she was in California, she had attended a meeting where the growth of urban farming in Detroit was discussed. And so to find a farm in her neighborhood was a pleasant surprise.

57. But then she learned that people in the Duggan Administration did not want the farm to remain, even though it predated the Duggan administration, and was the continuation of work done by the late great Ms. Delores Bennett, considered the great Matriarch of the North End, who had a farm in basically the same location in the 1980s.

58.. Thus, Ms. Warwick began attending DLBA board meetings and City Council meetings trying to fight for the continued existence of this farm, which provided free produce to people in the neighborhood and from around Detroit, and even brought people from not only around the country but also from around the world who were visiting Detroit.

59. Ms. Warwick also noted that many of her neighbors were being denied the opportunity to purchase DLBA-titled properties, when she noted others who were not residents of the North End, investor types, and/or were new to the North End were even buying houses without bidding in the DLBA auctions.

60. Now, the DLBA no longer auctions houses in the North End, unlike in other neighborhoods where DLBA auctions still occur. Rather the DLBA is selling houses and land through realtors working for the DLBA who ask for a plan and proof of funds. Many Detroiters do not even know that many of the realtor signs they see, are signs posted by realtors selling land for the DLBA.

61. Thus, she noted tensions rising in the North End due to what many considered unfair treatment of North Enders who wanted to acquire houses but were being denied the opportunity to purchase property, while they

witnessed investors coming in from even other states who were driving up housing and rent prices, at a time when many Detroiters had been or were still being overtaxed by the City—iow—the \$600 million overtaxation of many Detroit property owners, many of whom thus lost their homes.

62. Also, given that the North End was getting “hot”, many property owners in the North End began to regularly receive offers to buy their properties from realtors and real estate investors, by way of post cards, telephone calls, and even text messages.

63. People told Ms. Warwick that she was known as “the white girl on the bike” as she would ride her bike through the neighborhood and speak with residents about these matters and encouraged people not to sell their houses, given that housing prices were rising, and asking them, “Where would you go and get a house in a central location like this for what you are being offered?” and/or, “Why sell your family home?” and/or “Watch out, because I have seen people sell their houses, and after the seller leaves, I have seen a realtor sign posted at the house shortly thereafter, thus meaning that someone was quickly flipping it for a profit.”

64. Back in early 2015, Ms. Warwick went to the Planning Department and spoke with Mr. Dan Rierdan. He told her that the City was planning on

issuing an RFP that spring or early summer to do a planning study for the North End. Ms. Warwick asked Mr. Rierdan about community engagement around this process. It did not seem to be a matter of great importance to him, but he said that they would go to some community groups and get their input.

65. After this, Ms. Warwick spoke with neighbors and with them formed the Smith and Clay Block Club. The Club registered as a block club with the City.

66. Not long after that, another block club formed called the Horton, Custer, E. Bethune Block Club. Ms. Warwick began to get invites to that block club's meetings and after she noted that it appeared the City did not take Smith and Clay block club seriously, discussions began about merging the two block clubs, given the two had similar interests in the lower North End. So local residents participating in these block clubs voted to merge the two clubs into one and voted to call it the Lower North End Block Club.

67. Noting that the City seemed not to be doing much community engagement in the North End around development and that outside real estate investors were coming to the neighborhood and driving up housing and rental prices, Ms. Warwick continued to attend DLBA board meetings

and City Council meetings to ask for community engagement in the North End and ask for the long-awaited planning study for the North End.

68. Ms. Warwick kept asking when the City would do the planning study in the North End, and would get responses such as, "we're not getting to the North End this year." and "We can't be in all the neighborhoods at once doing planning studies" and "Wait for the new Planning Director to come", etc....Well the new Planning Director Maurice Cox had come and gone and still no planning study, even though Mr. Cox had assured Ms. Warwick that the City would so "community engagement" when it got to the North End.

33. In 2017, during a Charter-mandated meeting of Mayor's, the District 5 Manager of the Department of Neighborhoods (DON), Mr. Marshall Bullock approached Ms. Warwick and asked her to leave while the meeting was still going on. She asked why she was being asked to leave. Mr. Bullock replied, "Because I said so." Ms. Warwick replied "That's not a legal reason. What is your legal reason?"

67. Then a security guard in a light purple shirt came up and asked her to leave also. She asked again, "Why?" More security guards approached also. Then one of the guards falsely claimed that Ms. Warwick was causing a disturbance. She replied that they were the ones causing a disturbance



asking her to leave. Then security guards started putting their hands on her and were trying to take her out of the meeting. Ms. Warwick protested them battering her and not giving her a legal reason to leave, warning them not to falsely arrest her. This caused a scene and other residents approached the guards manhandling Ms. Warwick.

68. She recalls a guard telling a woman that she could not film what the guards were doing. The lady protested saying that she had a right to film what was going on.

69. At one point, a guard pushed Ms. Warwick and she almost fell down a short stairwell in the Erma Henderson Auditorium. Her neighbor had been asking them to leave Ms. Warwick alone.

70. Finally, Mr. Vince Keenan who had been a D5 DON Manager but was still working for the mayor came over and asked the guards if he could speak with Ms. Warwick, and to his credit stopped the mistreatment of these guards towards her.

71. Ms. Warwick subsequently left the meeting on her own accord with her neighbor with whom she came to the meeting.

72. Then a couple of months later, Ms. Warwick rode her bike to the Coleman A. Young Municipal Center(CAYMC) to get some court papers

she had requested earlier from the basement court records department, but had not yet obtained because by the time she had gone upstairs to pay for the documents and returned to the basement, that basement office was closed.

73. She did not return in the following days to get the papers because it had been raining, and she traveled mostly by bicycle. When she did return and asked for the papers showing her receipt that she had paid for them, the people in the basement records office did not have them and/or could not find them. Ms. Warwick said that she wanted her money back then if she could not get the papers she had already paid for.

74. Then a lady in the basement accused Ms. Warwick of having already received the papers and stopped talking with Ms. Warwick. Ms. Warwick suggested they have people sign a form documenting that they had picked up the papers, like the law department does when people pick up FOIA responses, given Ms. Warwick had been making FOIA requests to the City.

75. The people in the basement court records department stopped talking with Ms. Warwick, so she went up to the 2nd floor office of the Wayne County Clerk to try and deal with this matter. She found the people in the 2nd floor office to not be very helpful either, and then she saw a police

officer—an EPU officer—Timothy Flake— and some Securitas officers approach her in a not-very-friendly manner. She looked for an electric plug knowing that she did not have much power on her phone and anticipating trouble given how she had been treated at the Mayor's meeting.

76. Officer Tim Flake handed her back her receipt which she had shown the Clerk's office to show she had paid for the documents. He told her that she had to leave the building and was giving her a hard time.

77. Ms. Warwick did not want a similar situation to occur as had happened at the Mayor's meeting and she said that she was not going to stand for this, and started heading to the City Council offices on the City side of the CAYMC on the 13th floor. The guards followed her up to the 13th floor on the elevator.

78. When they got on the elevator, the Planning Director Maurice Cox was in it. Ms. Warwick simply looked down, not wanting to attempt to explain in a short elevator ride what was going on.

79. When they arrived at the 13th Floor, Ms. Warwick was surprised to find that the Council office had closed at 4:30pm, as she had assumed it was open until 5pm like other City offices.

80. Somehow, the guards finally let up on her a bit, and then she realized that she did not have the badge number of the EPU officer who had approached her on the second floor and started telling her to leave. So, she walked back towards the officer and said, "Hey what's your badge number?" and to her great surprise, he turned around and hit her with a throat strike.

81. After this her throat was hurting and when she got home she looked up on the internet to figure out what kind of move the officer had made against her. She found a video on what a throat-strike was, and the video explained that this was a Jujitsu defensive move to use if someone gets surrounded by say five guys and needs to make a quick move and run. The video maker explained that if a person uses this move offensively, that he or she is likely committing an assault and battery.

82. Ms. Warwick then called a friend of hers in California who has done security work and received an award for his work, and told him that a cop had hit her with a throat strike. The first words out of his mouth after that were something like, "He could have killed you, or crushed your trachea."

83. Ms. Warwick went that evening to the third precinct to report this crime against her, but the police did nothing about it.

84. Ms. Warwick later filed lawsuits in the United States District Court in Detroit on the occurrence at the mayor's meeting and the throatstrike event. The Honorable Linda Parker consolidated the cases.

85. Then on July 24th, 2019, Ms. Warwick was manhandled again at the CAYMC, and maliciously shoved out the door by two police officers after the Securitas guards had let her in the building with her bike helmet and a sign she had about presidential candidates to go make a FOIA request for documents regarding the two previous police encounters and security officers at the CAYMC. A Securitas person called her back as she was walking peacefully to the elevators carrying her bike helmet and her sign under her arm, not holding it up for people to see or to protest, and told her she could not come in with her sign. She asked, "What do you mean, they just let me in and we spoke about the sign. They said it was okay."

86. Prior to speaking with that Securitas person, another Securitas guard who had read the sign as she had just passed through the metal detector and was gathering her belongings off the conveyor belt, said that it was okay, "as long as it wasn't about Mike Duggan" to which Ms. Warwick responded, "That wouldn't be legal."

87. So, when this Securitas person approached her and told her she could not come into the building, she asked to see proof that she could not come in with it, thinking she was being needlessly harassed again, given the other guards had let her through after she had explained that she was not there to protest, but simply was going to make a FOIA request.

88. Ms. Warwick was trying to get to the law department well before 4pm given that another time she went into the law office around approximately 4:45pm, the receptionist starting giving her a hard time, and instead of simply let her fill out the paperwork and leave the request, the receptionist had called a police officer who put his hands on her and shoved her out the door at 4:55pm.

89. So, again, suspecting more harassment, Ms. Warwick asked the other Securitas person who had called her back from approaching the elevators to show her proof she could not come in with her sign.

90.. Apparently, this Securitas person or someone called a police officer to "get her up on out of here" and never come back out with his proof that she could not enter the building with her sign. But he did come out and watch the police officers manhandle her, which she did protest.

91. After the malicious shove out the door by the two police officers, one of whom just threw her belongings on the ground walkway on the Jefferson entrance, Ms. Warwick collected her belongings and attempted to come back in given no one had brought her proof that she could not come in with the sign. Then one of the guards as she was picking up her belongings positioned himself right behind her as she was asking someone to please film what was going on. He grabbed her and bully slammed her to the ground and falsely arrested her ridiculously claiming that she was going to use the sign as a weapon.

92. The police officer injured Ms. Warwick, and an EMS truck was called and she was taken to Detroit Receiving Hospital and then to the Detroit Detention Center where she booked and fingerprinted and had her mugshot taken and then was abused by guards when they jumped her in solitary cell with a camera in it and forcibly stripped to put non a "Bam-Bam suit" without having been properly screened for having suicidal or homicidal thoughts.

93. Subsequently, Ms. Warwick spoke by phone with prat one point spoke the City Law Attorney assigned to the case, Mr. Micheal Muller. He said to Ms. Warwick, something to the effect of,"Oh everyone here knows about

you, and we know about California, and you're psychotic and you scream when people touch you and I am going to crush you into the ground." This was before he knew about the July 24, 2019 slam down and arrest incident.

94. So, Ms. Warwick was dealing with the criminal prosecution, and having judges switched on her, one of whom was removed from the case for misconduct and her depression was and anxiety was getting worse.

95. Mr. Muller retired and the civil case was transferred to another attorney, while the criminal prosecution dragged on into Covid epidemic.

96. Then on March 1st, 2021, Mr. Daryl Carter of Avanath finally appeared at a block club meeting of the lower North End Block Club and presented the North End Landing Plan. Mr. Carter was met with tremendous opposition.

97. At this point, it was pretty clear that Mr. Carter had sat down with Vanguard CDC and their internal community cabinet which we already knew about given that Vanguard CDC had tried to push a similar development in 2017 after Ms. Dolores Bennett had passed away. But the developers they had sought to work with pulled out after one person from that group had heard and witnessed how badly Vanguard CDC had treated



people in the community. The Block Club had been waiting for Etta Garth of Vanguard CDC to come and speak with the block club, but kept being a no show to the meetings. Mr. Carter said that he would get back with us.

98. At this point, Ms. Warwick began to suffer extreme anxiety with early morning wake-ups. She even went to see physical health doctors for abdominal pains she was experiencing and was told for the first time in her life that she had high blood pressure and they wanted to put her on blood pressure medication. Ms. Warwick said to the doctors, "This can't be true. I have never had high blood pressure in my life." and she refused to take blood pressure medication.

99. The medical provider assisting Ms. Warwick with medication for her depression and anxiety and related ailments were trying to find medication that worked for her. They had been giving her Xanax for her anxiety but no longer wanted to prescribe that medication to her anymore and were giving her prescriptions for other medications, not all of which were really helpful for Ms. Warwick's severe depression, anxiety, and PTSD.

100. Also not long after Mr. Carter rolled out the plan he had been working on with Vanguard CDC in secret from us, some members of the Block Club were on a joint call discussing this proposed development which we

opposed for numerous reasons—the non-inclusive visioning and planning process used by Vanguard CDC and its NDA-signing cabinet, the massive rental complex being proposed which would essentially change our area from one of home ownership into a boxey mostly expensive rental community not in character with the historic homes left in the immediate area, the lack of homes for people to buy, and more, and discussing alternative ideas.

101. Ms. Warwick kept saying that as a group we should be principally focussing on the non-inclusive process used by Vanguard CDC and the developer.

102. While on the call, someone showed up at the door of one of our neighbors on the call asking him to sign a petition in favor of the development. Yet no one had come to the door of Ms. Warwick to ask for her signature. He came back on the call and told us what had just happened.

103. Ms. Warwick then warned the others on the call that she suspected they were going to go to the Land Bank and ask to buy the land anyway. So, we planned to go to the next Land Bank meeting which was the “Community Engagement” subcommittee.

104. Then, sure enough, at the next land bank meeting, Mr, Carter was there asking to buy land on Smith, E. Bethune, and Brush. Yet, we showed up in overwhelming opposition and the Land Bank Chair of that Committee said that she didn't think this could move forward.

105. Then, many of us went out and in a grass-roots fashion gathered over 600 signatures in opposition to the project mostly from residents in the lower North End.

106. Not long after that, we appeared at a Full Committee DLBA board meeting again demonstrating our overwhelming opposition. In the middle of people giving public comments against the project, Mr. Donald Rencher who, on information and belief at the time was the head of the Housing and Revitalization Department (HRD), was allowed to start talking about the project and was pushing it to the DLBA board.

107. At this point, Ms. Warwick realized that the City was in on this plan for some time, and that some City people such as the DON managers were in on it too.

108. Despite the overwhelming opposition we presented, the DLBA board, mostly selected by the mayor, voted 4-1 for the sale of the DLBA titled parcels, some of which local residents had asked to purchase as side lots

or otherwise but were given the run around and not told that the lots were on hold for this development, including Ms. Warwick.

109. Then the DLBA land sale was presented to the City Council Planning and Economic Development Committee. Lower North End residents showed up in great numbers again expressing our overwhelming opposition, except for Quincy Jones who kept saying how great the plan was and the “community engagement”, not revealing that he was selling land for the project or that he was part of Vanguard CDC’s selected, unelected “internal community cabinet.”

110. The opposition was so overwhelming that Ms. Warwick even saw the Planning Committee Chair James Tate roll his eyes. As Ms. Warwick recalls, he told the developers that they needed to go do more “community engagement.”

111. It appears in response to Mr. Tate and the opposition being received that the developers hired Ms. Sheila Cockrell as their lobbyist, and she held events with food and only invited Ms. Warwick to one of those meetings held on May 20, 2021. The flyer said that refreshments would be served, but Ms. Cockrell refused to let Ms. Warwick have any food if she did not sign the sign-in list.

112. Prior to this meeting, Ms. Cockrell called Ms. Warwick to talk about NEL. Ms. Warwick complained to Ms. Cockrell about the non-inclusive process used to come up with this plan and that a North End Planning study should have been done first. Then after that, Ms. Cockrell only invited Ms. Warwick to one of her “community engagement” meetings, as she must have realized that she could not persuade Ms. Warwick to state that she was in favor of this plan.

113. Per an incomplete document prepared by the Detroit Economic Growth Corporation, regarding the alleged “extensive community engagement”, it is mentioned that community engagement meetings were held with the North End Youth Improvement Council (who are getting funding from the developers and the lady who runs it as Ms. Warwick understands—is or has sold land for the development), the Historic North End Alliance, the Men of the North End ( a leader of which has passed around a false narrative in a facebook post that the “new” residents have no vested interest here and “were trying to stop the rebirth of the great North End—not true—and he wrote “Slide back to where you came from”, and North End Neighbors (a group which inaccurately claims that they represent the entire North End, when there are other block clubs, and

Shirley Davis of that group wrote that the opponents of the North End do not want anything good to happen in the neighborhood—another absolute falsity), Leadership of the Lower North End Block Club —(but why weren't all of the residents who participate in that block club invited to at all of those meetings?), and that the developers have met in small groups and/or individuals in 2023, but Ms. Warwick was not included or invited to these these small group or individual meetings.

114. The Detroit City Council recessed for the summer of 2021 and during that time, Ms. Warwick learned that some residents of the North End met with the developers and our District 5 Councilperson, then Pro Tem Mary Sheffield. Yet, Ms. Warwick was not included in those meetings. And despite asking who was in those meetings, she has never been told who exactly was permitted to attend the meetings.

115. Also back in 2021, not long after Mr. Carter revealed the North End Landing plan to the Lower North End block club, and before the City Council went on recess, the mayor held some of his Charter-mandated meetings. Opponents of North End Landing were attending these meetings in 2021, and expressing opposition. Ms. Warwick texted someone on the

zoom call and asked him to ask the mayor to meet with us, since he had just set up a meeting with Nicole Curtis, aka the Rehab Addict who was having a problem with the DLBA also.

116. In response to that request, the mayor said that he would meet with residents in the Lower North End. And in response to the overwhelming opposition to the plan being expressed, he said things like, "I just think you haven't had all your questions answered" and he assured us that we would be engaged in an "inclusive and sensitive" fashion.

117. The mayor had scheduled a zoom meeting with all of the residents in the lower North End who were in opposition to this secretly-made project, and then nearly at the last minute, he canceled the zoom meeting with all of the residents, and then, only met with some North End residents down at the CAYMC during more full-blown Covid.

118. Ms. Warwick found out later that at that meeting the mayor had said that he didn't like that Ms. Warwick had played a recording of him assuring opponents of NEL that we would be engaged in an "inclusive and sensitive" fashion at a DLBA board meeting, after which Ms. Warwick stated that what had been happening was not that at all. So, the mayor did not keep his word about meeting with opponents of NEL or that we would be

engaged in an “inclusive and sensitive” fashion/manner, or get all of our questions answered.

119. So, fast forward to the end of summer of 2021, and after the non-inclusive meetings with some North End residents while excluding the majority of would-be-impacted residents from those meetings, sometime in early September, the Lower North End Block Club met again, and discussed NEL.

120. While some of us knew that our block club President Ms. Lynette Roberson was in the summer meetings, the block club had not given that group of residents who did meet with the developers authority to negotiate on their behalf.

122. Ms. Paris Blessman of D5 City Councilmember Mary Sheffield’s staff attended that September meeting of the Lower North End Block Club. In that meeting, the block club voted a resounding “No” to the NEL project.

123. Then shortly, thereafter, the Detroit City Council voted unanimously for the DLBA land sale, and yet there was no mention whatsoever at the Council table of the Block Club’s “NO” vote against the land sale and the project.



124. Then after Ms. Warwick learned about these meetings, Ms. Warwick sent numerous emails to her District 5 Councilmember Mary Sheffield asking her to meet with the impact residents. But she received no responses.

125. Then one day, in the fall of 2021, when then Pro Tem Sheffield was chairing the Neighborhood Services Committee, Ms. Warwick asked why she/her office was not responding and why she would not meet with the impact residents as I had asked repeatedly and why she voted for the project.

126. Then Mary Sheffield went off on Ms. Warwick and claimed that her staff spent more time with Ms. Warwick than any other resident or something to that effect and she claimed that I was “abusive” to her staff and that in any other industry this would not be tolerated and that “it would not be tolerated here”.

127. Mary Sheffield mischaracterized Ms. Warwick’s petitioning government for redress of grievances and seemed to ignore that her staff was either ignoring me or not fully following through on matters Ms. Warwick brought to her attention.

128. This was also a form of ADA discrimination in Ms. WARwick's opinion, as Ms. Warwick had explained to staff in her office by leaving voicemails—because her office answering the phone when Ms. Warwick called was and still is an extremely rare occasion—in which Ms. Warwick explained that she suffered from PTSD and apologized for speaking in fight or flight , and also said that it should be no surprise that a resident was upset when he or she and his or her concerns were continuously ignored.

129. Also, Mary Sheffield held a virtual office hour after the Council vote for North End Landing, in which Ms. Warwick asked who were all these people that she had heard allegedly signed letters of support of NEL, and where did they live.

130. Councilmember Mary Sheffield responded, "I don't know. We got a stack of them," to which Ms. Warwick replied and asked, "If you do not know then why did you vote for this?"

131. Member Sheffield responded something like, "I do what I think is best for the residents of District 5". Then Ms. Warwick started typing in the chat that she had repeatedly asked this question by email and received no response. Then Member Sheffield's team dumped Ms. WARwick from the zoom call and would not let her back in.

132. At the State of the City address by the Mayor in 2022, now Council President Sheffield opened by saying something like, "We come to work everyday thinking about you. And if we are not delivering you the services and resources you deserve, let us know and we will pivot."

133. Not long after that at an Evening Community Council meeting, Ms. Warwick had signed up in advance to speak for four minutes at the meeting. At the meeting Ms. WARwick held up a sign that said "no more secret planning" and as she recalls "just say not to North End Landing".

134. Ms. WARwick explained briefly the non-inclusive planning around NEL, and said "why should you care about this? Because it should happen to you."

135. Then Ms. Warwick also repeated what President Sheffield had said at the State of the City address and asked the Council to pivot and follow the example of Member Gabriela Santiago Romero who pulled a land sale from the Planning Committee so that a planning study could happen first. Ms. WARwick watched Member Santiago Romero do this in early February 2022, when she hadn't even been on the job for two months.

136. Yet, earlier, Ms. Warwick spoke by phone with Mary Sheffield's Chief of Staff , Mr. Brian White, before the Council vote on the DLBA landsale for

NEL. Ms. Warwick asked Mr. Brian White why Member Sheffield would not simply not pull the land sale from the Council table so that a planning study could happen first. Then he gave her some kind of response implying that she could not do that, which Ms. WARwick knew at the time was very likely untrue.

137. So, after Ms. WARwick asked the Council at that Evening Council meeting to pivot on NEL and do a planning study, like Member Santiago Romero had done, she tried to speak with Member Sheffield. Member Sheffield said "We should meet" , and then Ms. Shirley Davis walked up and interrupted our conversation and started hugging Mary Sheffield and rocked back and forth while hugging her.

138. At the budget hearing for the Planning Department in 2022, Ms. Warwick explained how the vast majority of impact residents of NEL were secretly planned on by a selected, unelected group of residents who signed NDAs and did not invite the impact residents to these NEL visioning and planning meetings, and then asked everyone something to the effect of, "Who in the room would like to be treated this way? If you would like to be treated this way, please raise your hand".

139. Then Ms. Warwick looked around the room, and no one had raised his or her hand. Then Ms. Warwick said, "I don't see any hands raised. So, if no one in this room would like to be treated this way, then why should any Detroiters be treated this way?" She received no responses from the Council, a frequent occurrence when Ms. Warwick would speak at public comment and ask question and/or bring up issues like, "Why can't we do the planning study first and all plan together?"

140. At a Council Evening Community meeting this past Spring of 2023, held at Second Ebenezer Church—the church of Bishop Edgar VAnn—founder of Vanguard CDC, Ms. Warwick explained to the people in the room again how the impact residents of NEL except one—Quincy Jones—were secretly planned on by a group of selected, unelected NDA signing residents, and asked the people in the room if they would like to be treated this way to please raise their hand. Again, no one raised his or her hand and so, again, Ms. Warwick said again, "I don't see any hands raised, so why should any Detroiters be treated this way?" Then Ms. Warwick received applause from the audience.

141. At a Council meeting during February of 2022, Ms. Warwick brought up the fact that former Mayor Young and Mary Ann Mahaffey were okay

with pushing the people out of Poletown for General Motors. She also stated that she had read that Mayor Young was considered one of the best financial managers of the City, and then brought up the “Nuisance abatement” takings by the DLBA and the Mayor, and that she and a Law School Professor both thought that these takings were a violation of Michigan law regarding eminent domain.

142. Then instead of address the issue of the Nuisance Abatement takings, Member Coleman YOUNG went off on Ms. Warwick saying she was disrespecting his father, totally missing the point of the topic she was trying to get the Council to address.

143. Since then, his office hardly ever answers Ms. Warwick’s phone calls or emails—she does not recall his office responding to her emails asking Member Young to meet with the impact residents of NEL or regarding other matters.

145. Given that in the document the NEL developers submitted to the Detroit Brownfield Authority stated that the expected construction start time would be in 2024, Ms. Warwick by emails and at public comment at Council session asked that the Council permit the opponents of NEL to meet with their newly formed that year District 5 Community Advisory Council

(D5CAC) and discuss this resident-divisive proposed project. She asked that this Council respect her other elected officials under the Charter and this Charter process. Yet, no Councilmember responded at these Council meetings or to her emails.

146. Then at a North End Planning Study meeting held in June of 2023, Ms. WARwick saw Member at Large Young in attendance, and she walked up to him and asked if he would let the impact residents meet with their D5 CAC. He walked away from her and only uttered “maybe” and he got in a car with his Chief of STaff and they drove away.

147. Later, when Ms. Warwick brought up at public comment to the Council that Member at Large Young was being unresponsive to her emails and phone calls and that they barely ever answered the phone and would even pick up and then hang up, Member Young said some untrue things saying that his staff always answered the phone, that Ms. Warwick had followed him around at a meeting—the Planning meeting mentioned above—as if she were harassing him—not true—and that he had spoken with Ms. Warwick about NEL for 15 hours if she recalls correctly—but whatever the time he mentioned was not true.

148. Earlier this year, a woman who lives in the North End, Ms. Agnes Hitchcock, the founder of a group called "Call'em out" which holds yearly meetings in which residents nominate public officials and figures that they think disregard the desires of the people and rather work for the "oppressors" for Sambo awards. She announced the winner of the Sambo awards that year, including Member Scott Benson, who as she recalls got the second place Sambo award.

149. Then later during the budget hearings held this year 2023, when residents were not allowed to comment after each Department presented their budget requests, but rather were only allowed to do public comment after say two or perhaps even three budget hearings, there had been some kind of technical glitch—as at this point Council was doing hybrid in-person and zoom call meetings. So, President Sheffield said something like, "well I guess we can do public comment now."

150. Ms. Warwick was watching this meeting on Channel 10 and saw that a City employee, Mr. Irvin Corley was gesturing to President Sheffield to not do public comment.

151. Then when the opportunity for public comment did happen after this, Ms. Warwick said something like "That was pretty disgusting Mr. Corley. I



saw you gesture to President Sheffield when she was about to do the right thing to do public comment to not do so. I nominate you for Sambo award #4.” Then Member Durhal went off on Ms. Warwick saying that it was “racist for a white person to say that word”—but no one scolded Ms. AGnes Hitchcock, a very intelligent black woman when she presented the Sambo awardees to the Council earlier.

152. Ms. Warwick afterwards called Member Durhal’s office and spoke with Mr. Herve Leonard and said that she didn’t know that Sambo was the new “N” word that white people could not say, and that no one had scolded Ms. Hitchcock for using that word. Mr. Leonard tried to tell Ms. Warwick that Member Durhal’s comment was not directed at her—to which she replied and asked, “then who was that directed to?” And she wrote his office an email and sent a link explaining the etymology of the word Sambo and that it was perhaps derived from African language and was used by Spanish people to refer to persons who were of mixed ethnicity—either black and native American(the Americas) or black and white. Then she wrote about how someone had screamed at Ms. Warwick in a store “WHITE BITCH LEAVE!!!!” and asked “What about that bigotry?”

153. In that email, she explained that she had attended some of the Sambo award events and participated in the vote and that no one there at those events told her that she could not participate—and that the attendees did not have a problem with her participation.

154. Ms. Warwick does not recall Member Durhal's office ever responding to her emails, including asking things like for him to meet with the impact resident to get their side of the story about NEL, or why can't we do the planning study first.

155. Then later, Ms. Hitchcock came back to speak at public comment and mentioned that Member Benson got the a Sambo, and complained that he went along with just about everything the mayor wanted, disregarding important issues brought up by residents—or something to that effect.

156. Then at Ms. Warwick's turn at public comment that same meeting, she said, among other things, "I second the emotions of Agnes Hitchcock."

157. Then Member Benson went off on Ms. Warwick claiming it was a racist thing for a white person to use the word "Sambo".

158. Ms. WARwick forwarded the email she wrote to Member Durhal to Mr. Benson and other Council members about the use of the word Sambo, and how no one had scolded Ms. Hitchcock.

159. Around that time, Member Tate sent Ms. WARwick an email saying that as a black man he could answer her question about who can and should label a black man Sambo, and he wrote that that "The Correct answer is NO ONE!" Then he wrote that people who identify with the race of individuals who birthed the derogatory term should never use it. Yet, Ms. Warwick has never identified with the Spanish colonizers of the Americas. Member Benson wrote among other things that "You still feel free to use and defend it because it is your 'right' to do so". Yet to her knowledge, Member Benson did not send Ms. Hitchcock an email telling her it was unacceptable to use that word.

169. Mr. Benson also wrote that Ms. Warwick should make a public apology to Mr. Corley for what she had said.

171. Ms. Warwick did speak with Mr. Corley and apologized if she had offended him and explained that she was offended that he had gestured not to do public comment when the Council was limiting public comment at the budget hearings unlike in previous years, when she remembered being able to do public comment after all of the departments had presented, and that she did commend him (which she did so at public comment) for mentioning his concern that the administration was not doing enough to

make sure that people on the other side of the digital divide were getting information about the budget and she thanked him for that. Ms. Warwick and Mr. Corley had a nice conversation and he did not exhibit animosity towards Ms. Warwick.

172. Just recently there was a ground-breaking ceremony for an apartment complex in the lower North End which Ms. Warwick attended. Ms. Warwick did not oppose this development because it was being built on all privately acquired land and the developer as she understood it was seeking deeper affordability than the federally created AMI—area median income, which is higher than the AMI for Detroit.

173. It seemed that the minute she got there, Mayor Duggan's top EPU officer, Mr. Raymond Buford was tailing her during the meeting standing behind her. When the mayor was about to leave, Ms. Warwick tried to approach him and did ask him to keep his word and meet with the impact residents of NEL. But Mr. Buford stood in her way, with his arms crossed and prevented her from getting near the mayor. The mayor got in a vehicle and left.

174. In a recent Mayor Charter-mandated meeting in 2023, when it was Ms. WARwick's turn to make public comment and ask a question, she asked

the mayor to please keep his word and meet with the impact residents of NEL. Instead of respond to the question asked, Mayor Duggan said something like, "You just don't like the result. You don't like democracy." and then she was transferred to a waiting room in which she spoke with a DON manager and asked if she would get the mayor to answer her question about would he keep his word and meet with the impact residents, and she asked who would be responding to her inquiry. The female DON manager replied something like, "All I can do is pass along the question."

175. At the Mayor's State of the City address on March 7, 2023 , the Mayor Duggan had a screen put up with the photos of the faces of black developers that he said the City was doing projects with. She noted a photo of Mr. Daryl Carter in the image of the numerous black developers. This was before all of the final votes for NEL have occurred.

176. Earlier this year at a meeting of the long-awaited North End Planning Study, Ms. Warwick spoke with Kevin Schronce, a planner in the Planning Department. She mentioned to him that give the roll-out of the controversial North End Landing project in 2021, that she recalled how convenient it was for him, when he came to do a tour of the North End in 2019, organized by the Historic North End Alliance, and prompted by Ms.

Warwick's request to then Council President Brenda Jones to come to the North End and speak with North End residents about what we would like to see happen in our neighborhood, that after the tour which started in the northern part of the North End and then headed south, that he and President Jones's Chief of Staff Stephen Grady, both conveniently said they had to leave as the people riding in the van for the tour approached the lower North End, and that she now knew that he must have known that North End Landing was being secretly planned on us. He tried to say that the Planning Department was not in charge of that project and that it was HRD. He also said to me that "the mayor did a handshake deal" on NEL.

177. Ms. Warwick told Mr. Schronce that that could not be true that the Planning Department had nothing to do with NEL because she knew that the Planning Department did "site plan" reviews, and that these documents asking for approval for projects are signed by the Planning Director.

178. Ms. Warwick brought up this statement by Mr. Schronce about the mayor doing a handshake deal about NEL at public comment at City Council.

179. Later in June of 2023 at a meeting of the long-awaited North End Planning Study, Ms. Warwick approached Mr. Schronce and asked him with

whom the mayor did the hand-shake deal. Then Mr. Schronce denied ever saying that to Ms. Warwick-to which she replied, "That's not true. You did say that to me."

180. Under the Declaration of Rights of the 2012 Detroit City Charter, right #2 states: "The City has an affirmative duty to secure the equal protection of the law for each person and to insure equality of opportunity for all persons. No person shall be denied the enjoyment of civil or political rights or be discriminated against in the exercise thereof because of race, color, creed, national origin, age, disability, sex, sexual orientation, gender expression or gender identity."

181. On information and belief, City of Detroit officials conspired with Vanguard Community Development Corporation, formed by Bishop Edgar Vann, to plan the proposed NEL development with a small group of all black, selected, unelected residents who signed Non-Disclosure Agreements—NDAs, to plan this development in secret from the vast majority of the would-be-most-impacted residents who live in and/or own property in the footprint area of the planned development before implementing/appropriating money to do a truly inclusive Planning Study in the North End first, thus purposely excluding Ms. Warwick, a Caucasian

Detroit resident, from full participation in the long-awaited North End Planning study which the Detroit City Council finally approved just weeks after voting for the Detroit Land Bank Authority sale of publicly-owned parcels in the early fall of 2021 for this controversial proposed development.

182. These actions, Ms. Warwick believes were discriminatory in violation of Ms. Warwick's civil rights, including: in retaliation for Ms. Warwick's exercise of her free speech rights, including the right to petition the government for redress of grievances; (she suffers from PTSD, anxiety, depression, and other mental health ailments for which she takes medication and which cause her difficulty in her life activities, such as concentration, sleep deprivation—early morning wake-ups with severe anxiety—and cause her to speak in “fight or flight” —a classic symptom of person with PTSD); and in favor of longer-term black residents and black developers—Vanguard Community Development Corporation formed by Bishop Edgar Vann, a black man, and Mr. Daryl Carter, a black man, of Avanath Capital Management based in California, and Mr. Ronald McDonald, a black man, of RMC, Development, based in Maryland, in violation of the Detroit City Charter's Declaration of Rights #2, the U.S. and



Michigan's Constitutions' prohibition on racial discrimination and violations of her rights to equal protection under the law, the right to interstate and intrastate travel, and in violation of the Michigan Elliot-Larsen Civil Rights act prohibition of racial discrimination in public services—in this case the City sponsored and paid for North End Planning Study of her neighborhood involving neighborhood planning of publicly-owned property.

183. On Vanguard CDC's website, under "COMMUNITY ENGAGEMENT AND PLANNING" it states that " Vanguard believes that community development must rest on the needs ideals, needs and desires of that community. We believe that all development especially in existing neighborhoods of color must be based on the values of racial justice and economic equity". But how is it racial justice to exclude a white resident who lives right on the block of where most of NEL is planned for from the visioning and planning of that development—meaning Vanguard CDC's all black and longer-term residents? And also when there are long -term black residents here who also oppose the NEL development and were denied the opportunity to acquire sidelots, which were later sold for the NEL project?

184. Vanguard CDC's website also states under HOUSING DEVELOPMENT, that "NEL has the full support of the City of Detroit."

185. Vanguard CDC's mission statement, also on its webpage, states:

Vanguard's mission in the Historic North End is to create a vibrant and healthy community where people live, work and play. Our core values are ECONOMIC EQUITY and RACIAL JUSTICE."

186. Ms. Warwick asks how what Vanguard CDC is doing now is in line with their mission statement, when in the Historic North End, there have always been some white people living here, and at a time there was a large Jewish community living and working in the North End, along with black residents, and there are Jewish residents here now, and that this project is causing residents of the lower North End so much grief and anxiety, and distrust of Vanguard CDC and the City?

187. And Ms. Warwick asks how does pushing a neighborhood and resident divisive NEL plan on the vast majority of impact residents, black, white, and mixed, who do not want it and would have liked to be included in Vanguard CDC's community planning of the immediate area in which they live align with their stated Core Values?

188. And if Vanguard's mission statement is economic equity, then why are they not planning more housing for residents to purchase and get a piece of the Detroit pie, instead of mostly rental housing?

189. Also, Mr. Daryl Carter and Mr. Ronald McDonald are, as Ms. Warwick can tell, very successful in real estate ventures across the country? Apparently being black has not impeded their financial and business success.

190. Word gets back to Ms. Warwick from other North End residents that she is being called a “racist” and “the crazy white lady”. This was not happening when Ms. Warwick moved to the area in which she worked in the mid 90s.

191. Also, Ms. Warwick has asked by email and in person to Ms. Sheila Cockrell, hired as a consultant by the developers apparently to overcome the grassroots opposition, why Ms. Warwick was not invited to all of the “community engagement” meetings that she held and what she was telling people. The time she asked Ms. Cockrell in person these questions this past June at a meeting of the long-awaited North End Planning Study, Ms. Cockrell walked away from Ms. Warwick and said “Good-bye Joanne” and got in her car and drove away.

192. One day, a few weeks ago, Ms. Warwick witnessed a black resident scream at a white volunteer at the farm in the lower North End "Get out of my neighborhood!"

193. Ms. Warwick also spoke with a white female resident of the lower North End, who does not get involved much in local politics as far as Ms. Warwick knows, who experienced a black person drive by her house and throw a paper bag with something in it—something like that—and screamed "Get out of my neighborhood!"

194. For all of the reasons stated above, this has been a very ugly situation and not truly inclusive development process for Ms. Warwick. She has become agoraphobic and has been experiencing such extreme anxiety that she messed up her suit against the officers and people she filed suit against regarding security type people and others who tried to make her leave the CAYMC building and battered her, and pulled the lawsuit.

195. Thus, please forgive that this complaint is not necessarily in chronological order of the events that have occurred. But she is writing this in an attempt to correct the First Amendment retaliation, and lack of unequal treatment of residents, and intentional infliction of emotional distress caused by the purposeful exclusion from the original planning of

NEL by Vanguard CDC and HRD, and the Planning Department, and the purposeful exclusion from “community engagement” meetings held by Ms. Sheila Cockrell and others.

196. Ms. Warwick asks when are we going to arrive in Detroit at Dr. King’s, Washington DC “I have a dream” speech? –To include all of God’s children and to judge people’s character not based on their skin color, which no one chose, but rather on the content of their character? Why all this racial division and animosity toward white people, many of whom were not even a lusty thought in 1967, and had nothing to do with the over-taxation of Detroiters by over \$600 million, and who want to live in the City of Detroit in a diverse community?

### **COUNT 1**

**1st Amendment and 14th Amendments to the U.S. Constitution–Free speech and Right to Petition Government for Redress of Grievances**

**42. U.S.C. §1983 and Right to Free speech under the Michigan Constitution**

197. All preceding paragraphs are incorporated by reference

198. At all relevant times, Defendants have acted under color of law, and the private actors in conspiracy with the City Actors to either plan and or

advance the NEL project , on information and belief to plan with a select few NOOrth End residents who were all black and longer-term residents to the exclusion of Ms. Warwick before a Planning Study could be done in the NOOrth End.

199. Defendants' above described conduct violated Plaintiff's right to freedom of speech and the right to petition government for redress of Grievances about the immediate area in which she lives during a Planning Study in the North End that is finally underway.

200. Defendant's acted with an apparent deliberate indifference to Plaintiff's mental distress caused by their actions

COUNT II—violation of Equal Protection under the  
*Elliott Larser Civil Rights Act*  
law under the U.S. and Michigan Constitutions, and Right #3 Under the  
Michigan Constitutions *& Detroit City Charter Declaration*  
*of Rights #2.*

201. Defendants acted under Color of law or in conspiracy to violate Plaintiff's right to be treated equally under the law and fully included in the North End Planning Study about her immediate area in which she lives, and not be excluded from the planning by a small select group of Residents

of NEL or they have thus far condoned it by going along with the program,

despite Ms. WARwick's pleas for inclusion. *in a truly inclusive Planning Study First,*

202. On information and belief and it feels like to Ms. WARwick that all

Defendants have acted with a deliberate indifference to her expressed

mental anguish over this matter. *and thus have violated her rights to equal protection*

Count III-28. U.S.C. Section 1983-Racial

discrimination-acting to favor black developers

203. Defendants acted under color of law and or in conspiracy with the

State Actors to favor black residents and black developers and excluding

Ms. WARwick who is white, by either planning NEL or by later supporting it

thus condoning the planners's actions.

204. Defendants have acted with apparent difference to Defendant's stated

mental anguish. *about this non-inclusive situation and thus violated her rights.*

## Count VI

### Request for Emergency Preliminary Injunction - Fed. R. Civ. Pro 65

204. Plaintiff respectfully requests that Defendants Mary Sheffield, Jones Tate, Scott Benson, Fred Durhal, ~~Jess~~ Latisha Johnson, Coleman A. Young II, ~~Latisha Johnson~~ Mary Waters, Gabriela Sandiags Romero and Angela Calloway <sup>and ~~her~~</sup> be enjoined/restrained/prevented/stopped disallowed from voting on anymore North End <sup>(NEL)</sup> Landing proposal votes including items 18.4, 18.21, 18.22, 18.23



Complaint Continued - Warwick

18.24, 18.25, 18.26, and 18.27  
on today's July 25, 2023 City Council  
agenda for the Committee of the  
Whole and that the publicly owned  
parcels revert back/go to the City  
of Detroit to be included in  
the North End ~~REDACTED~~ Planning  
and Mayor Duggan from signing off on it.)  
Study finally happening now.

205. Plaintiff thinks this is

fair because the developers have  
not properly taken care of the land  
by allowing it to be littered with  
garbage and the developers'

mowers simply mow over garbage without picking it up first or afterwards  
206. The mowers at the DLA pick up garbage before they mow. So this would be fair since the Developers did not make sure the lots were clean and left a house unboarded on <sup>Ms Warwick's</sup> my block for a very long time, putting her at risk.

207 Plaintiff  
Request for Attorneys  
fees, costs and a jury trial  
(oops - please see)

Woolwich Complaint

208. Plaintiffs requests \$75,000  
each from Mr. Darryl Oarden  
and Mr. Ronald McDonald for the  
years of grief they have put her  
through by planning in secret  
with all black and long-term  
residents, while excluding her  
from the envisioning and planning  
process about land on her block  
and for hiring Sheila Cockrell  
to overcome our grassroots opposition  
to the controversial project,

209. And Plaintiff requests general and punitive damages for the violations of her Federal constitutional and Michigan constitutional rights for her mental anguish and physical suffering as a result of this conduct; all to be determined according to proof;

210 Award attorneys fees ~~and costs~~ pursuant to 42 U.S.C. Section 1988.

211 Award costs of suit

212. And order such other relief as the Court may deem just and proper.

Warwick Complaint cont'd.

Respectfully and apologetically  
submitted

By: Joanne Warwick  
264 Smith Street.

Detroit, MI 48202

Tel. # 415-724-3124

warwick\_joanne@yahoo.com

P.S. Please see Exhibits A + B  
after this page.



Mr. Warwick's house

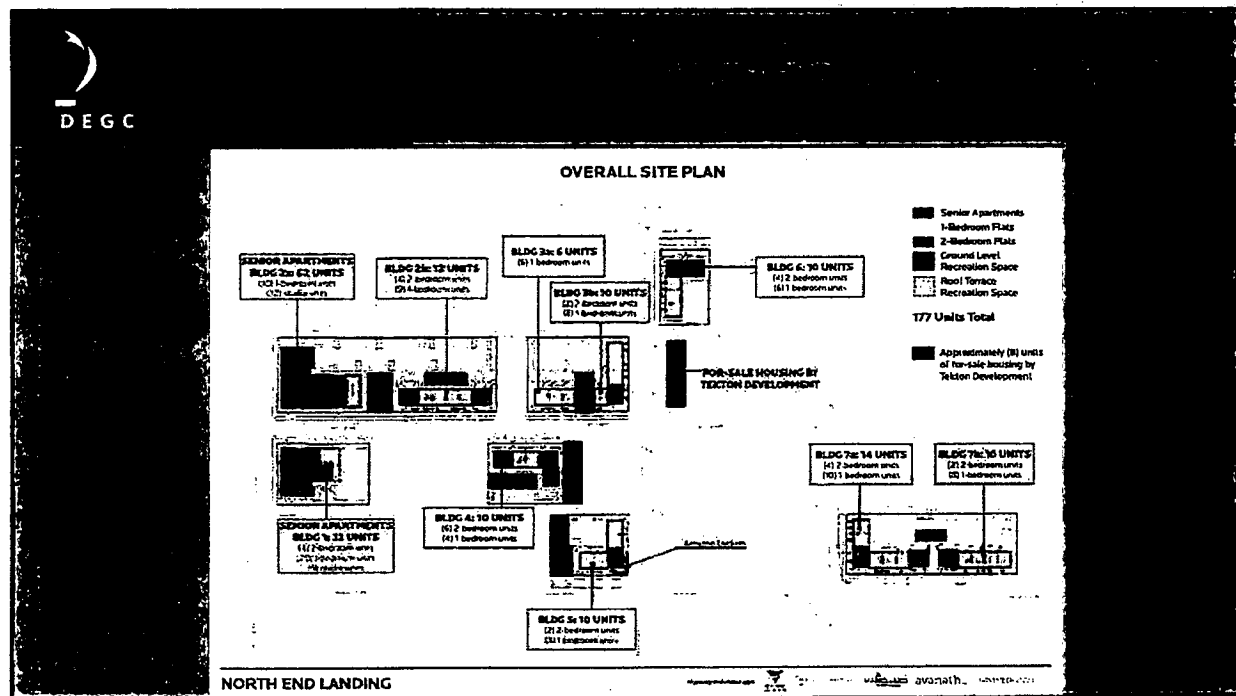
**Monthly Rent by Bedroom Type**

Bedroom Type	Studio	1BR	2BR
Affordable @ 80% AMI	\$1,050	\$1,252	\$1,501
Market Rate	\$1,250	\$1,600 - \$1,670	\$2,000 - \$2,200


**Monthly Rent by Bedroom Type**

Bedroom Type	Studio	1BR	2BR
Affordable @ 80% AMI	\$1,050	\$1,252	\$1,501
Market Rate	\$1,250	\$1,600 - \$1,670	\$2,000 - \$2,200

	Stocks	BON	BON YTD
Affordable @ 80% AMI	\$1050	\$1252	\$1911
Market Rate	\$1250	\$1400 - \$1470	\$2400 - \$2200



# North End Neighborhood Framework Plan



**Looking forward while  
honoring the culture,  
legacy, + glory of the  
North End's past**

## Project Overview

The City of Detroit has launched the North End Neighborhood Framework Plan to be a guiding document to support the equitable and inclusive growth and stability of the North End neighborhood. It will be created through a participatory planning process that involves residents and community members of the neighborhood over the course of 12-16 months.

The Planning and Development Department's goal is to create a healthy and beautiful Detroit built on an atmosphere of trust with inclusive growth and economic opportunity that builds off of previous planning studies.

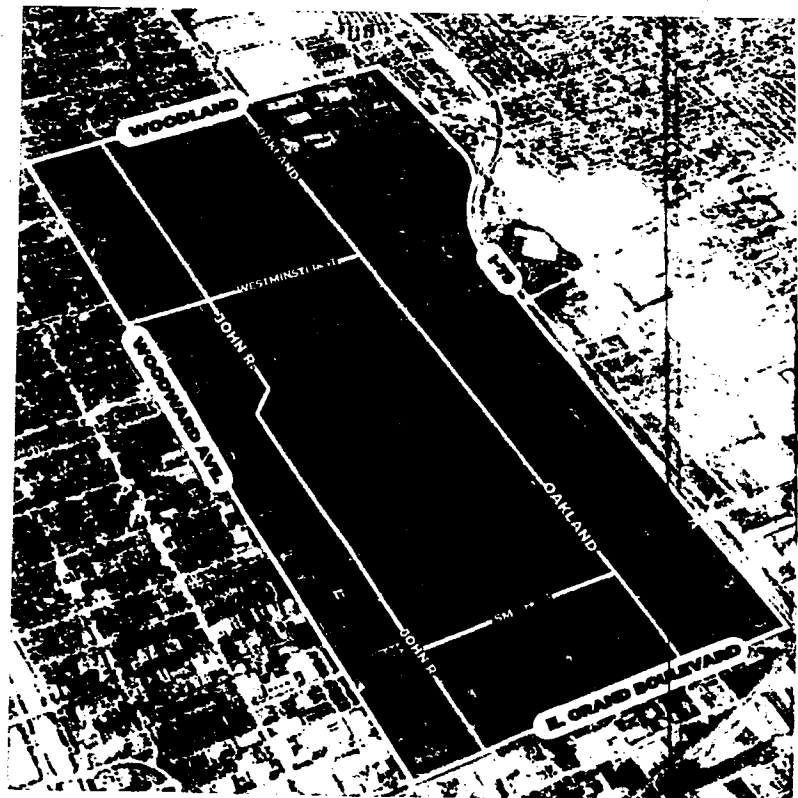
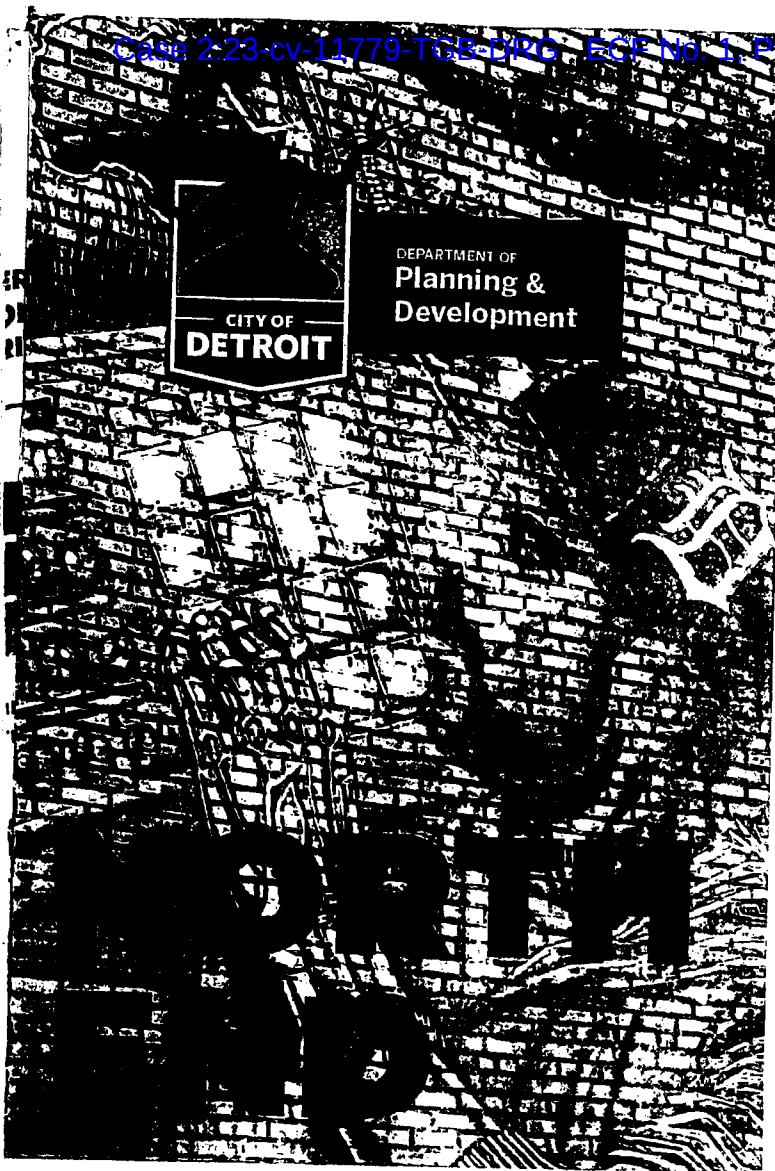


EXHIBIT B





# Neighborhood Framework Plan

**You are invited!**

**COMMUNITY EVENT**

**SATURDAY JUNE 24**

OAKLAND AVENUE URBAN FARM

9300 OAKLAND

**11:00AM-1:00PM**

**RSVP:**

**[tinyurl.com/NorthEndJuneMeeting](https://tinyurl.com/NorthEndJuneMeeting)**

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Joanne Warwick

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

## DEFENDANTS

City of Detroit, et al.

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 2 Federal Question (U.S. Government Not a Party)
- ☐ 3 U.S. Government Defendant
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |                                         | PTF                        | DEF                        |                                                               | PTF                        | DEF                        |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation                                                | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care: Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing: Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

## VI. CAUSE OF ACTION

Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE July 25, 2023 SIGNATURE OF ATTORNEY OF RECORD Joanne Warwick

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes  
☐ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes  
☒ No 3

If yes, give the following information:

Court: US District Court

Case No.: 22-11707

Judge: Goldsmith

Notes :

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